

Law Office of Mohammed Gangat

675 3rd Ave, Su 1810, NY, NY 10017
(718) 669-0714 mgangat@gangatpllc.com

VIA ECF

November 8, 2024

Hon. Magistrate Judge Lee G. Dunst
United States District Court
Eastern District of New York
100 Federal Plaza, Courtroom 830
Central Islip, New York 11722

**Re: *Serrano, et. al. v. C.R. Landscaping and Tree Service Corp. et al,*
No. 2:20-cv-04372-NRM-LGD**

To The Honorable Judge Dunst:

This office represents plaintiffs Jimmy Serrano, Jorge Diaz, and Arnoldo Paredes, (“Plaintiffs”) in the above captioned action.

I write in accordance with Your Honor’s Order of October 23, 2024, requesting that the parties submit a joint status report addressing whether Plaintiffs are withdrawing the pending motion for default judgment against defendants C.R. Landscaping and Tree Service Corp.; C.R. Tree & Lawn Service Corp.; and Candelario Rivera. Counsel for Defendants has reviewed and approved this letter.

In light of Defendants new counsel appearing in this action, Plaintiffs will be withdrawing their motion for default judgment.

Plaintiff and the new defense counsel had been discussing the withdrawal. Plaintiff requested the new defense counsel discuss withdrawing the motion in conjunction with either renewed summary judgment practice or preparing a joint pretrial order. New defense counsel indicated they are seeking to restart discovery essentially from the beginning, with paper demands being served and depositions being taken. I explained discovery is closed and that depositions were completed. They told me they had not reviewed the file because they don’t have the file and cannot take a position. This matter can be further discussed at the upcoming conference.

As always, I thank the Court for its time and consideration.

Respectfully submitted,

/s Mohammed Gangat
Mohammed Gangat, Esq.